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6 Attorneys for Plaintiff  
United States of America  
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8 IN THE UNITED STATES DISTRICT COURT  
9  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 REYES QUINONEZ,  
15 Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO  
STIPULATION AND ORDER RE EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
DATE: July 17, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

16  
17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
18 through defendant's counsel of record, hereby stipulate as follows:

19 This case is set for status conference on July 17, 2024. By this stipulation, defendant now moves  
20 to vacate the status conference and set the case for a change of plea hearing on August 19, 2024, and to  
21 exclude time between July 17, 2024, and August 19, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

22 a) The government represents that discovery in this matter, including officer worn  
23 body camera, police reports, and other items have been produced to defense.

24 b) The parties are close to an agreement and need the additional time to finalize a  
25 plea agreement and prepare for the change of plea hearing.

26 c) Defense counsel also requests the additional time to review the discovery, meet  
27 with his client, conduct independent investigation.

28 d) Counsel for defendant believes that failure to grant the above-requested

1 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
2 into account the exercise of due diligence.

3 e) The government does not object to the continuance.

4 f) Based on the above-stated findings, the ends of justice served by continuing the  
5 case as requested outweigh the interest of the public and the defendant in a trial within the  
6 original date prescribed by the Speedy Trial Act.

7 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
8 et seq., within which trial must commence, the time period of July 17, 2024 to August 19, 2024,  
9 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results  
10 from a continuance granted by the Court at defendant's request on the basis of the Court's  
11 finding that the ends of justice served by taking such action outweigh the best interest of the  
12 public and the defendant in a speedy trial.

13 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
14 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
15 must commence.

16 IT IS SO STIPULATED.

17  
18 Dated: July 11, 2024

PHILLIP A. TALBERT  
United States Attorney

20  
21 /s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

23  
24 Dated: July 11, 2024

25 /s/ REED GRANTHAM  
REED GRANTHAM  
Counsel for Defendant  
Reyes Quinonez

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3                   **ORDER**  
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IT IS SO ORDERED.  
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DATED: 7/11/2024  
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*Sheila K. Oberto*  
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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE  
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